

**FINDING OF SUITABILITY TO TRANSFER (FOST)
FORMER MARCH AIR FORCE BASE, CALIFORNIA
PARCEL A-9
SEPTEMBER 2005**

1. PURPOSE

1.1 The purpose of this Finding of Suitability to Transfer (FOST) is to document environmentally related findings and the suitability to transfer the real property and any improvements on Parcel A-9 at former March Air Force Base (AFB), California, to March Joint Power Authority (hereinafter Transferee). The description of the property for which this FOST supports is provided in Section 2 below. The described property will be transferred by deed and its anticipated use is to continue operation of the wastewater treatment plant by Western Municipal Water District (WMWD).

1.2 This FOST is a result of a thorough analysis of information contained in the following documents:

- (1) Final Environmental Impact Statement (FEIS) for the Disposal and Reuse of March AFB, dated February 1996;
- (2) Basewide Environmental Baseline Survey (EBS), dated November 1994;
- (3) EBS Category Update, dated February 1999;
- (4) Final Remedial Investigation/Draft Final Feasibility Study (RI/FS) Operable Unit (OU) 2, dated July 1997;
- (5) Final Operable Unit (OU) 2, Air Force Real Property Agency (AFRPA), Record of Decision (ROD), dated April 2004;
- (6) Visual Site Inspections (VSIs), dated February 18, 2005;
- (7) Supplemental EBS (SEBS) for Parcel A-9, dated August 2005.

2. PROPERTY DESCRIPTION

The Property being addressed by this FOST is shown on the map included at Attachment 1 and comprises approximately 32 acres. The Property includes an open field and 17 structures associated with the Wastewater Treatment Plant (WWTP). Table 2.0 identifies these facilities and associated details.

**Table 2.0
Property Inventory Description**

Facility Number	Former Use	Square Footage (approximately)
5901	Tool Room	1,075
5902	Sample Room	100
5903	Office	1,110
5904	Chlorine Facility	549

Facility Number	Former Use	Square Footage (approximately)
5905	Waste Treatment-Pump House	349
5907	Secondary Clarifier (northeast)	Unknown
5908S	Digester	90
5908N	Digester	90
5910	Storage	Unknown
5913	Sewage Treatment & Disposal-Chlorine Chamber	Unknown
5914	Pump Reservoir (north)-Lift Station	113
5915	Digester	90
N/A	Trickle Filter northwest	150
N/A	Trickle Filter southwest	150
N/A	Primary Clarifier (southeast)	Unknown
N/A	Pump Reservoir south	Unknown
N/A	Reservoir-earthen pond	Unknown

3. NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMPLIANCE

The environmental impacts of this property transfer proposal have been adequately analyzed and disclosed in compliance with the NEPA. These impacts are analyzed in the FEIS, as appropriate. The environmental impacts were determined to be insignificant.

4. ENVIRONMENTAL CONDITION OF THE PROPERTY

Based on a review of the VSIs and the supporting SEBS documentation, the overall Property is considered Department of Defense (DoD) Environmental Condition Category (ECC) 4. Category 4 is defined as “areas where release, disposal, and/or migration of hazardous substances has occurred, and all removal or remedial actions to protect human health and the environment have been taken.” The condition of the Property has changed from the condition identified in both the original Basewide EBS and the 1999 EBS Category Update. The Basewide EBS originally classified the Property as DoD ECC Category 7, and the 1999 EBS Category Update classified the Property as DoD ECC 1, 3, 4, and 6. Sites 19 and 24 are now ECC 4 based on the completion and regulatory approval of the OU 2 ROD, April 2004. Changes have been made to the environmental condition property categories for the parcel based upon progress of the Installation Restoration Program (IRP) that has occurred since the EBS was originally developed.

For reference, DoD property categories are defined as follows:

Category 1: Areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas).

Category 2: Areas where only release or disposal of petroleum products has occurred.

Category 3: Areas where release, disposal, and/or migration of hazardous substances have occurred but at concentrations that do not require a removal or remedial response.

Category 4: Areas where release, disposal, and/or migration of hazardous substances has occurred, and all removal or remedial actions to protect human health and the environment have been taken.

Category 5: Areas where release, disposal, and/or migration of hazardous substances has occurred and removal or remedial actions are underway, but all required actions have not yet been implemented.

Category 6: Areas where release, disposal, and/or migration of hazardous substances have occurred, but required actions have not yet been implemented.

Category 7: Areas that are not evaluated or require additional evaluation.

5. DEED RESTRICTIONS AND NOTIFICATIONS

The environmental documents listed in Section 1.2 were evaluated to identify environmental factors (Attachment 3) that may warrant constraints on certain activities in order to substantially minimize or eliminate any threat to human health or the environment. Such constraints typically are embodied as permanent restrictions in the deed or as specific notifications to the Transferee. The factors that require either deed restrictions or specific notifications are identified in Attachment 3 and are discussed below. Please reference the EBS, SEBS, and applicable VSIs for more detailed information on each resource category.

The Air Force has determined the remaining factors listed in Attachment 3 do not pose an unacceptable threat to human health or the environment, consistent with governing regulatory processes, and therefore do not require deed restrictions or notifications to the Transferee, and are not discussed below.

5.1 Hazardous Substances Notification

Consistent with the provisions of CERCLA § 120(h)(3), which requires that whenever federal property on which hazardous substances were stored for one (1) year or more, released or disposed of, is conveyed, each deed entered into for the conveyance of such property will include a notice of the type and quantity of such hazardous substances and of the time at which such storage, release or disposal took place. This notice requirement was codified at 40 CFR, Part 373, which provides that the notice requirement applies only when hazardous substances are or have been stored in quantities greater than or equal to (1) 1,000 kilograms or the hazardous substance's CERCLA reportable quantity found in 40 CFR Part 302.4, whichever is greater (40 CFR Part 373.2(b)); or (2) 1 kilogram if the substance is an acutely hazardous substance found in 40 CFR Part 261.30 (40 CFR Part 373.2 (b)). Additionally, this regulation also provides that the notice required for the known release or disposal of hazardous substances applies only when the hazardous substances are or have been released in quantities greater than or equal to the substance's CERCLA reportable quantity.

A list of hazardous substances known to be stored for a period of one year or more on the property at quantities requiring notification, or disposed of on the Property, is provided in Attachment 4, Notice of Hazardous Substances Stored. Reported releases on the property are provided in Attachment 5, Notice of Hazardous Substances Released. The property contains some level of contamination by hazardous substances. This is addressed in Section 5.2, titled

Installation Restoration Program (IRP) sites. Additionally, a hazardous substance notice will be given in the deed of the type and quantity of hazardous substances and the time at which storage for one (1) year or more, release, or disposal took place.

5.2 Environmental Restoration Program: Installation Restoration Program (IRP) sites and Areas of Concern (AOC).

5.2.1 IRP Sites and AOCs. There are two IRP sites (19 and 24) and no AOCs located within the boundaries of Parcel A-9 where release, disposal, and/or migration of hazardous substances has occurred, and all removal or remedial actions to protect human health and the environment in accordance with CERCLA § 120 (h)(3) have been taken for the property. The determination that all remedial actions necessary to protect human health and the environment is supported by the Final OU 2 ROD dated April 2004.

The OU 2 ROD selected the Institutional Control (IC) remedy for Site 19, and no further action for Site 24. The IC remedy for Site 19 includes land use restrictions that will be incorporated in the deed as grantee covenants, and in a state land use covenant (SLUC). In the SLUC, the restrictions will be expressed in a different format, but they will be consistent with the grantee covenants in the deed. The SLUC will be signed and recorded immediately prior to deed transfer. The selected remedy is consistent with the current and anticipated future land use for the parcel surrounding Site 19 as a wastewater treatment plant.

Groundwater at Parcel A-9 is a very shallow, low yield formation and may contain elevated levels of naturally occurring arsenic. The poor quality of the groundwater is not a result of past Air Force activities on the parcel. The potential for future use of groundwater as a potable source is extremely unlikely.

5.2.2 IRP Institutional Controls: The following institutional controls will be established for the property in order for the Air Force to comply with its obligation under CERCLA and the OU 2 ROD. **The deed will include the following covenants.**

Covenants will be included in the Deed to ensure that any response or corrective actions that are the responsibility of the Air Force for hazardous substances released or disposed of on the property prior to the date of the deed which are found to be necessary after the date of delivery of the Deed will be conducted by the United States. The above response assurance by the Air Force does not mean the Air Force will perform or fund any remediation to accommodate a change in land use desired by the Transferee that is inconsistent with any use restriction or covenants contained in the deed or other related property transaction documents.

Covenants will be included in the deed to allow the United States access to the property in any case where any such response or corrective action is found to be necessary, or where such access is necessary to carry out a response or corrective action on adjoining property.

The deed will also contain a reservation of access to the property as required under CERCLA for the Air Force, USEPA, and the State of California, and their respective officials,

agents, employees, contractors, and subcontractors for purposes consistent with the Air Force Installation Restoration Program (“IRP”) or the Federal Facility Agreement (“FFA”).

With respect to Site 19, Former Sludge Drying Beds, the following restrictive covenants will be included in the deed, and a SLUC to be recorded in the land records of the County of Riverside prior to recording of the deed (Attachment 2 includes a map identifying the IRP Sites and Monitoring Wells).

- Grantee covenants and agrees that it will not use Site 19 for residential purposes, hospitals for human care, public or private schools for persons under 18 years of age, or day care centers for children.
- Grantee covenants and agrees that it will not conduct or allow others to conduct any activity that would disturb the soil in the former sludge drying beds.
- Grantee covenants and agrees that it will not conduct or allow others to conduct activities that would result in removal, disturbance, or other interference with fences or other barriers to access to or signs notifying the public of Site 19.
- Grantee covenants and agrees to protect and allow the United States access to the two monitoring wells (5M24MW1 and 5M24MW2, Attachment 6).

5.3 Petroleum Products and Derivatives.

No petroleum contaminated sites are present on Parcel A-9.

5.4 Oil/Water Separators (OWSs).

No OWS were/are present on Parcel A-9. The EBS identified what was believed to be an OWS at building 5913. The EBS Category Update and corresponding VSI corrected this misidentification. The correct identification for the equipment is a “chlorine contact tank”.

5.5 Unexploded Ordnance.

There were no known unexploded ordnance (UXO), discarded military munitions (DDM), waste military munitions (WMM), explosive soils, explosive debris, and/or munitions constituents (MC) on the property. The Deed, through the CERCLA covenant will ensure that any response or corrective actions that are the responsibility of the Air Force for military munitions substances release or disposed of on the property prior to the date of the deed which are found to be necessary after the date of delivery of the Deed will be conducted by the United States. The Deed will also ensure access to allow any response or corrective action found to be necessary on adjoining property.

5.6 Radioactive & Mixed Wastes.

There were no known radioactive or mixed waste sites on this property.

5.7 Underground and Aboveground Storage Tanks (USTs and ASTs).

One UST was located on the Property and two ASTs are located on the Property. The 300-gallon UST identified at Facility 5901 was removed in 1994 and received closure from County of Riverside Department of Environmental Health in October 1994. Both AST tanks are currently being used by WMWD. The AST identified at Facility 5903 is a 500-gallon diesel tank constructed of steel and installed in 1994. The other AST is a 25-gallon diesel tank constructed of steel and located at Facility 5901. Both tanks provide fuel for the emergency generator. The Transferee will be responsible for complying with all applicable Federal, State, and local laws relating to the use of these tanks. Written release of liability from Transferee is required. **This is a deed notification.**

Table 5.3
Storage Tanks

Tank Number/Contents	Tank Capacity (gallons)	Location	Site, Releases, and/or Spill Number	Tank Status	Tank Closure Date
UST-5901/Diesel	300	Facility 5901	N/A	Removed 1994	1994
AST-5901/Diesel	500	Facility 5901	N/A	Active	AST is still in use to provide fuel for the emergency generator
AST-5903/Diesel	25	Facility 5903	N/A	Active	AST is still in use to provide fuel for the emergency generator

5.8 Asbestos-Containing Material (ACM)

The facilities as described in Section 2.0 contain asbestos-containing material (ACM). **The deed will contain the following notifications.**

5.8.1 ACM in Structures or Buildings: Based on an inspection of the property and a review of the environmental baseline survey reports, the ACM located in structures on the property is in good condition and not damaged or deteriorated to the extent that it creates a potential source of airborne fibers.

5.8.2 ACM in Utility Pipelines: No CERCLA response action for ACM in below ground utility pipelines is required at this time. ACM, such as transite pipes or pipes wrapped with asbestos insulation, may be found in (or on) utility pipelines located on the property. ACM associated with utility pipelines below ground does not pose a threat to human health or environment as long as it is not disturbed, or, if it is disturbed, proper care is taken to manage and dispose of it. Utility pipelines below the ground have not been inspected. The property recipients and subsequent transferees will be given notice of the possibility of ACM in utility

pipelines through a notice in the deed. The deed will provide notice to the property recipients that the Air Force will not be responsible for the ACM in utility pipelines.

5.8.3 ACM in Demolition Debris: ACM, which was commonly used in building materials, may be located at building demolition locations. Based upon an inspection of the property and a review of the environmental baseline survey reports, no such locations are specifically known on these parcels. No CERCLA response action is required at this time. However, it is possible that there are undiscovered locations where demolition debris may be found by the property recipient or subsequent transferees during ground disturbance activities. The property recipient and subsequent transferees will be cautioned by notice in the deed to exercise care during ground disturbing activities. The property recipient or subsequent transferees will be required to notify the Air Force promptly of any demolition debris containing friable asbestos and believed to be associated with Air Force activities. The property recipients or subsequent transferees will be required to allow the Air Force a reasonable opportunity to investigate and, if a CERCLA response action is necessary, to accomplish it.

5.8.4 General: The deed will contain a provision stating that the property recipient and subsequent transferees, in their use and occupancy of the property, will be responsible for complying with all applicable Federal, state, and local laws relating to asbestos. The deed will also state that the Air Force will be responsible for conducting any CERCLA remedial action found to be necessary for hazardous substances released or disposed of on the property prior to the date of the deed, so long as the property recipient is not a potentially responsible party under CERCLA for the release or disposal. The above response assurance by the Air Force does not mean the Air Force will perform or fund any remediation to accommodate a change in land use desired by the property recipient that is inconsistent with use restrictions or covenants contained in the deed or other related property transaction documents.

5.9 Drinking Water Quality.

The potable water system on the former March AFB has been transferred to WMWD. Facilities located on the property are connected to this potable water system.

5.10 Indoor Air Quality (Radon).

The Air Force has not tested for radon gas in facilities on the property.

5.11 Lead-Based Paint (Housing).

No target housing or residential property is located on parcel A-9.

5.12 Residuals of Lead-Based Paint and Lead-Based Material and Debris (collectively, "LBP")

Lead-based paint (LBP) was commonly used prior to 1978 and, therefore, LBP may be on the Property. Furthermore, LBP may have come to be in the soils as a result of deterioration, maintenance activities, and demolition. Based upon its evaluation of available records, the Air

Force has concluded that remedial action under CERCLA is not necessary.

Therefore, the deed shall include a notice to the transferee and subsequent transferees, notifying them that LBP may be on the property and advising them that caution should be exercised during any use of the property that may result in exposure to LBP. By a grantee covenant in the deed, the transferee and its successors will acknowledge and accept responsibility for managing LBP in accordance with all applicable laws and regulations and for promptly notifying the Air Force of any discovery of LBP in soils that appears to be the result of Air Force activities and is at concentrations requiring remediation. The transferee and subsequent transferees will be required to provide the Air Force an opportunity to investigate such discoveries, and, if a CERCLA remedial action is necessary, to accomplish it. The deed will reserve a non-exclusive easement to Air Force to enable it to investigate any such discoveries and take any remedial action found to be necessary. **This is a deed notification.**

5.13 Polychlorinated Biphenyls (PCBs).

All regulated PCB transformers were removed from March AFB by February 1994.

5.14 Air Conformity/Air Permit/Outdoor Air Quality.

Air emission sources are present on the property. The Transferee will be responsible for obtaining any necessary air emission permits prior to operation of these sources. **This is a deed notification.**

5.15 Energy (Utility Infrastructure/Lines).

Gas and electric utilities service the facilities located on the parcel. Utility systems are not included in this FOST.

5.16 Floodplains.

Parcel A-9 is outside of the 100-year floodplains.

5.17 Historic Property (Archeological/Native American, Paleontological)

No historic buildings, or archeological/Native American sites are known to be located on or have been recorded on Parcel A-9.

5.18 Sanitary Sewer Systems (Wastewater).

Facilities located on the parcel are connected to the sanitary sewer system. The sanitary sewer system has been transferred to WMWD and is not part of this FOST.

5.19 Sensitive Habitat.

No sensitive habitat is located on Parcel A-9.

5.20 Septic Tanks (Wastewater).

No septic tanks are located on Parcel A-9.

5.21 Solid Waste.

Solid wastes, to include municipal solid waste, are transported and disposed offsite at a permitted disposal facility. The transferee will be responsible for securing all future disposal services and complying with all applicable federal, state and local laws relating to solid waste disposal.

5.22 Threatened and Endangered Species.

No Federal or state listed threatened, endangered or candidate species have been observed on Parcel A-9.

5.23 Wetlands.

No portions of Parcel A-9 are classified as designated wetlands.

5.24 Pesticides.

March AFB had an established pesticide management program conducted in accordance with DOD guidance and under the supervision of a DOD certified Entomologist. It is possible that pesticides were applied to the Property for routine or general maintenance. There are no historical records of pesticide storage or release on the Parcel A-9. Extensive IRP records review and site assessments have not identified pesticides as a chemical of concern for Parcel A-9.

6. REGULATOR COORDINATION

The California Department of Toxic Substances Control (DTSC) and the United States EPA were notified on May 5, 2005, of the initiation of the FOST, supporting EBS, and SEBS documentation and were invited to participate in preparing the working draft documents consistent with the provisions of AFRPA's Procedures for Processing Findings of Suitability to Lease/Transfer (FOST/FOSL and Supporting Environmental documents, issued jointly by Alan K. Olsen, AFBCA, Thomas W.L. McCall Jr., DAS/ESOH, and Timothy Fields Jr., DAA/OSWER in a memo dated June 8, 1995). Consolidated draft documents were provided on May 6, 2005, for their review and comment. USEPA and DTSC comments and AFRPA responses are included as Attachment 7.

6.1 Unresolved Comment

All comments provided by the regulators were addressed and/or incorporated in this document. There is one unresolved comment related to the possible presence of lead-base paint on facilities constructed prior to 1978. Please see FOST Attachment 7, Regulator Comments and Air Force Responses (DTSC comments: A-9 FOST, specific comment No. 9).

7. PUBLIC NOTICE

A public notice (Attachment 8) regarding the FOST was published in a local newspaper on May 17, 2005.

8. FINDING OF SUITABILITY TO TRANSFER

The deed proposal has been adequately assessed and evaluated for: (a) the presence of hazardous substances and contamination on the Property (b) environmental impacts anticipated from the intended use for the Property, (c) adequacy of use restrictions and notifications to ensure that the intended use is consistent with protection of human health and the environment, and (d) adequacy notice of disclosures, including those required by CERCLA 120(h). The anticipated future use of this Property does not present a current or future risk to human health or the environment subject to inclusion and compliance with the appropriate restrictions on use and disclosures as addressed above. The following covenant CERCLA language will be included in the Deed:

- CERCLA 120(h)(3)(A)(ii)(I) warranting that all remedial action under CERCLA necessary to protect human health and the environment with respect to hazardous substances remaining on the Property have been taken before the date of transfer.
- CERCLA 120(h)(3)(A)(ii)(II) warranting that any remedial action under CERCLA found to be necessary after the date of transfer with respect to such hazardous substances remaining on the property shall be conducted by the United States.
- CERCLA 120(h)(3)(A)(iii) granting the United States access to the Property in any case in which remedial action or corrective action is found to be necessary after the date of transfer.

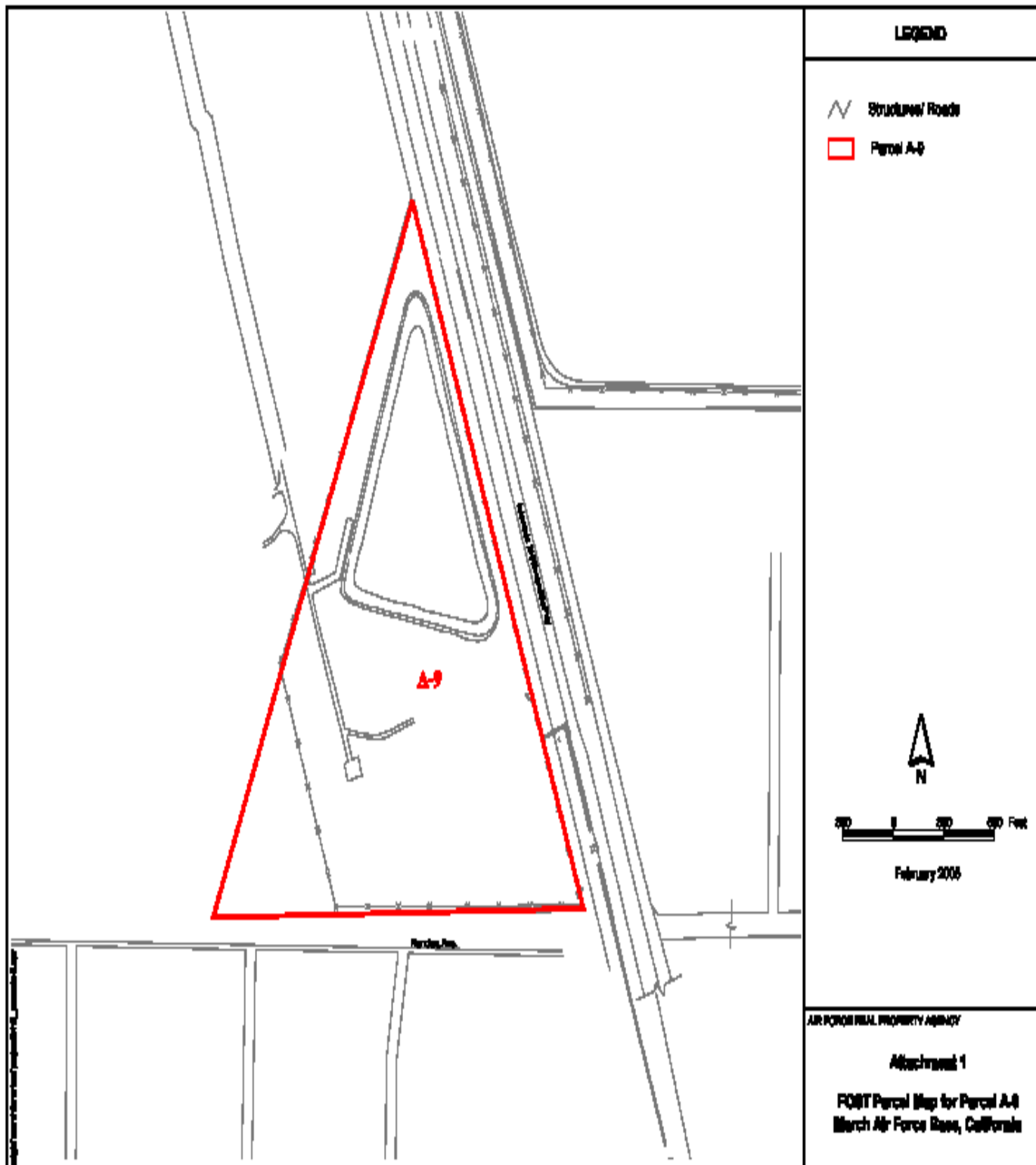
The Conditions of CERCLA Section 120(h) have been satisfied. Therefore, the property is suitable for transfer.

Date

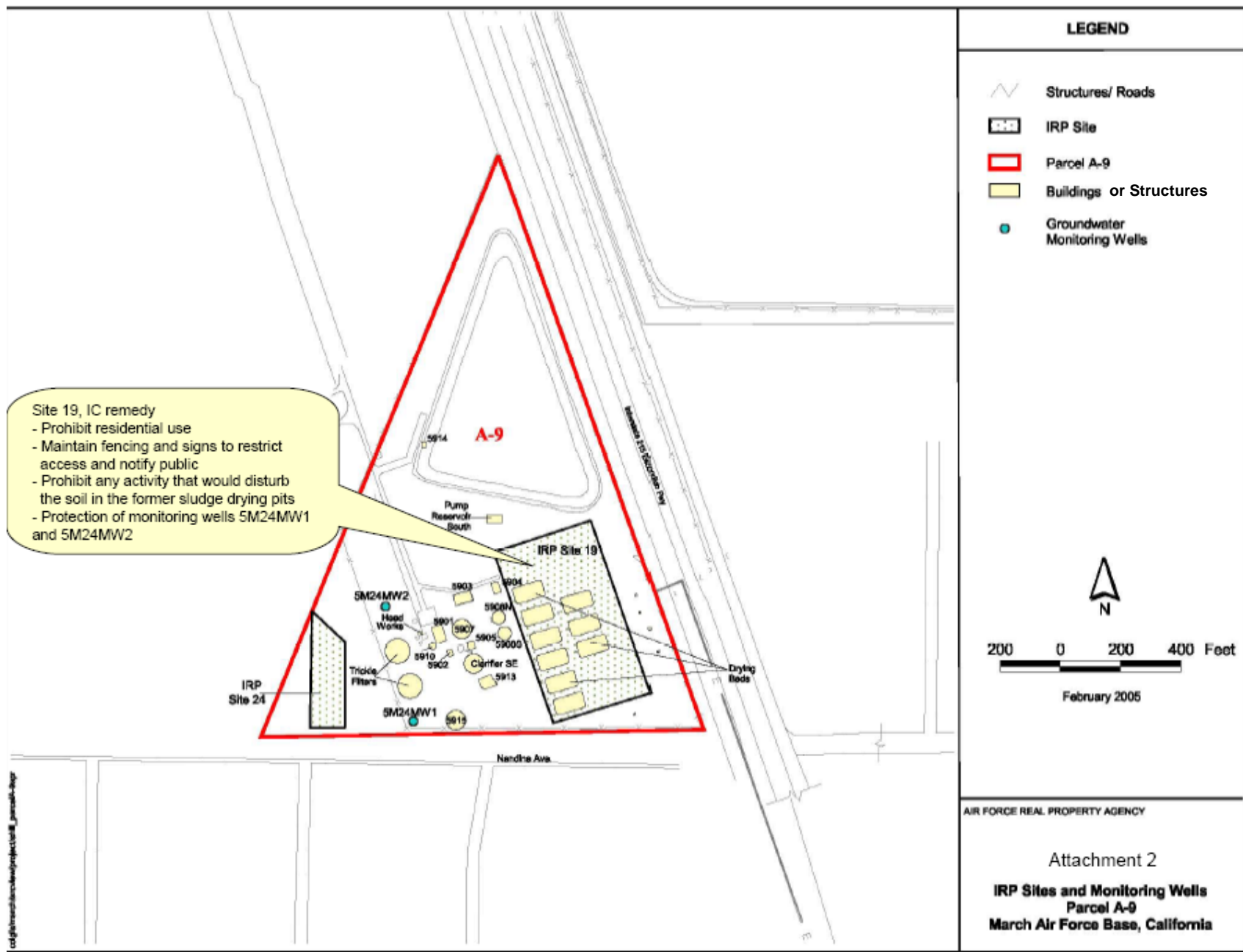
KATHRYN M. HALVORSON
Director
Air Force Real Property Agency

Attachments:

1. Parcel A-9 Map
2. Parcel A-9 IRP Sites and Monitoring Wells
3. Environmental Factors Table
4. Hazardous Substance Stored/Disposed
5. Notice of Hazardous Substance Release
6. Monitoring Well Survey Data
7. Regulator Comments and Air Force Responses
8. Public Notice, Notice of Intent--FOST



Parcel A-9 Map
March AFB, California



ENVIRONMENTAL FACTORS TABLE

(Note: Each item identified with an "X" in the "Yes" column is discussed in Section 5)

Deed Restriction or Notification Required?		<i>Environmental Factors Considered</i>
No	Yes ¹	
		<i>Environmental Restoration, Hazardous Substances, Petroleum</i>
	X-N	Hazardous Substances (Notification)
	X-D	Installation Restoration Program (IRP)
X		Petroleum Products and Derivatives
X		Oil/Water Separators (OWSS)
X		Unexploded Ordnance
X		Radioactive & Mixed Wastes
	X-N	Storage Tanks (USTs/ASTs)
		<i>Disclosure Factors/Resources:</i>
	X-N	Asbestos
X		Drinking Water Quality
X		Indoor Air Quality (Radon)
X		Lead-Based Paint (Housing)
	X-N	Residuals of Lead-Based Paint and Lead-Based Material and Debris
X		PCBs
		<i>Other Factors:</i>
	X-N	Air Conformity/Air Permits/Outdoor Air Quality
X		Energy (Utilities)
X		Flood plains
X		Historic Property (Archeological/Native American, Paleontological)
X		Sanitary Sewer Systems (Wastewater)
X		Sensitive Habitat
X		Septic Tanks (Wastewater)
X		Solid Waste
X		Threatened and Endangered Species
X		Wetlands
X		Pesticides

¹ For this column, deed restriction or notification is indicated using the following nomenclature:
Deed Restriction=X-D and Deed Notification=X-N

NOTICE OF HAZARDOUS SUBSTANCES STORED/DISPOSED

Notice is hereby given that the tables and information provided below from the *1994 Environmental Baseline Survey (EBS)* and the *Supplemental EBS* contain a notice of hazardous substances that have been stored on Parcel A-9 at March Air Force Base and the dates that such storage took place. The information contained in this notice is required under the authority of regulations promulgated under section 120(h) of the Comprehensive Environmental Response, Liability, and Compensation Act (CERCLA or "Superfund") 42 U.S.C. section 9620(h).

Sewage Treatment Plant - March AFB

Substance Stored	Regulatory Synonym(s)	CAS Registry Number	Quantity Stored kg/year	Dates Stored	Hazardous Waste ID Number
Chlorine	NL	7782-50-5	6622.45	1994	Not applicable

NOTICE OF HAZARDOUS SUBSTANCES RELEASED

Notice is hereby provided that the information set out below from the *1994 Environmental Baseline Survey (EBS)* and the *Supplemental EBS* provide notice of hazardous substances that have been released on Parcel A-9. The information contained in this notice is required under the authority of regulations promulgated under section 120(h) of the Comprehensive Environmental Response, Liability, and Compensation Act (CERCLA or "Superfund") 42 U.S.C. section 9620(h).

IRP Site 19

Substance	Regulatory Synonym(s)	CAS Registry Number	Quantity kg/lbs	Date	Hazardous Waste ID Number	Response
PAHs	Polynuclear Aromatic Hydrocarbons	1336-36-3	Unknown	Unknown	N/A	Yes
PCBs	Poly-chlorinated biphenyls	1336-36-3	Unknown	Unknown	N/A	Yes
Hexavalent Chromium		7440-47-3	Unknown	Unknown	Unknown	Yes
Thallium		7440-28-0	Unknown	Unknown	Unknown	Yes

IRP Site 24

Substance	Regulatory Synonym(s)	CAS Registry Number	Quantity kg/lbs	Date	Hazardous Waste ID Number	Response
PAHs	Polynuclear Aromatic Hydrocarbons	1336-36-3	Unknown	Unknown	N/A	Yes
PCBs	Poly-chlorinated biphenyls	1336-36-3	Unknown	Unknown	N/A	Yes
Antimony		7440-36-0	Unknown	Unknown	Unknown	Yes
Barium		7440-39-3	Unknown	Unknown	Unknown	Yes
Cadmium		7440-43-9	Unknown	Unknown	Unknown	Yes

NOTICE OF REMEDIAL ACTION TAKEN

Notice is hereby given that the information below from the 1994 EBS and the Supplemental EBS is a notice of the remedial action taken on the Property with respect to hazardous substances that were released on Parcel A-9 at the former March Air Force Base. The information contained in this notice is required by regulations promulgated under Section 120(h) of the Comprehensive Environmental response, Compensation, and Liability Act, 42 U.S.C. Section 9620(h).

IRP Site 19. The remedial action for IRP Site 19 is a prohibition on use of the property for residential, school, day care or hospital use, and restrictions on soil disturbance activities. These land use restrictions will be deed covenants that run with the land. See the Operable Unit 2 Record of Decision (ROD), April 2004, for additional information.

IRP Site 24. The Air Force conducted a removal action at IRP Site 24 in December 1996. Approximately 19,300 cubic yards of non-hazardous waste was removed. Confirmation samples taken after the removal action confirmed that the site had been cleaned to levels protective of human health and the environment. The Operable Unit 2 ROD, April 2004, decided no further action was required.

ATTACHMENT 6

Parcel A-9 Monitoring Well Coordinated
North American Datum (NAD) 83

Well ID	Date Installed	Northing Coordinate (y) Feet	Easting Coordinate (x) Feet
5M24MW1	6/24/1993	2260363.38	6253513.23
5M24MW2	6/24/1993	2260741.78	6253420.59

**AFRPA RESPONSE TO
EPA COMMENTS DATED JUNE 30, 2005
DRAFT FOST PACKAGE, PARCEL, PARCEL A-9
MARCH AIR FORCE BASE**

Cmt #	EPA Comment	AFRPA Response
1	There is no discussion of the groundwater quality. If there is no contamination, it should be stated.	The OU 2 RI/FS and ROD evaluated groundwater quality and determined that no action was necessary for the sites within Parcel A-9. The groundwater at this parcel is very shallow and of poor quality mainly from arsenic at natural background levels. The following statement was added to Section 5.2, "Groundwater at Parcel A-9 is a very shallow, low yield formation and may contain elevated levels of naturally occurring arsenic. The poor quality of the groundwater is not a result of past Air Force activities on the parcel. The potential for future use of groundwater as a potable source is extremely unlikely."
2	There is no discussion of pesticides. If there is no contamination, it should be stated.	Pesticides are not a chemical of concern at Parcel A-9. This has been added to section 5.24 of the FOST
3	The FOST needs a deed restriction rather than notification. The deed restriction should prohibit reuse as residential until a LBP sampling and assessment and any necessary abatement is done.	The LBP language in Section 5.12 is standard AFRPA language and was not changed. As stated in the FOST, the deed will include a notification that the grantee and successors acknowledge and accept responsibility for managing LBP in accordance with all applicable laws and regulations.
4	The description of the deed provisions, appearing at page 4 and page 11, should include a right of access for the regulators. The OU-2 ROD provides for the following: "Each deed will also contain a reservation of access to the property as required under CERCLA for the Air Force, USEPA, and the State of California, and their respective officials, agents, employees, contractors, and subcontractors for purposes consistent with the Air Force Installation Restoration Program ("IRP") or the Federal Facility Agreement ("FFA").	The FOST's right of access language has been changed and is now consistent with the OU-2 ROD.

**AFRPA RESPONSE TO DTSC COMMENTS
MARCH AFB A-9 DRAFT FOST/SEBS
JULY 1, 2005**

Item	DTSC Comments	AFRPA Response
General Comment		
1.	Please ensure consistency between the SEBS and the Finding of Suitability to Transfer (FOST).	Consistency has been checked between the Supplemental Environmental Baseline Survey (SEBS) and the FOST, changes were made as appropriate.
2.	Please spell out acronyms the first time they are used in the document (i.e., AFB, RCRA, IC, EPA, CRWQB, and USFWS).	Acronyms will be spell out for the first time they are used in the document in the next submittal.
SEBS		
Specific Comments		
1.	Executive Summary, Paragraph 2-The paragraph states that the review of the adjacent properties included various sites/units/tanks within ¼ mile of Parcel A-9, hereinafter referred to as the "Property" and all underground storage tank sites within 500 feet of the Property. However, the last sentence in the paragraph states that Site Y does not impact the Property. This is somewhat confusing. What about all the other sites that were looked at? Do they in any way impact the Property? Please explain. Also, please include a figure showing adjacent properties within a ¼ mile radius of the Property.	All other sites have reviewed and were found not to impact the Property. Future submittals will include the status of sites within ¼ mile of the Property boundaries within the Executive Summary. A figure showing adjacent properties within a ¼ mile radius of the Property will be included in the next submittal of the SEBS.
2.	Pages 1 and 2, Section 2.0, Survey Methodology, #5-Has a Draft Final or final 2003-2004 Annual Monitoring Report been issued? If so, please update the information.	The latest available information was used and no update to the SEBS is required.
3.	Pages 1 and 2, Section 2.0, Survey Methodology, #8-The date for the Draft Final Remedial Investigation/Feasibility Study (RI/FS) for Operable Unit (OU)-2 (November 1996) does not match the date shown in the FOST. The date for the Draft Final RI/FS for OU-2 is listed as July 1997. Please make the necessary corrections in the SEBS and/or FOST. Also, why isn't a final RI/FS document listed?	The correct date is July 1997 and the correct title of the document is Final RI/Draft Final FS.
4.	Pages 1 and 2, Section 2.0-, Survey Methodology, #10-There is a Visual Site Inspection form dated 1/27/2005 included in Attachment 3. Was this included by mistake? If so, please remove.	The VSI dated January 27, 2005 was accidentally included in this SEBS submittal. This VSI was removed from the Attachment.
5.	Page 2, Section 5.1, Visual Site Inspection (VSI)-Please see Specific Comment #4 above.	No changed is needed, the date listed for the VSI is correct. The VSI dated January 27, 2005 has been removed.
6.	Page 3, Table 5-1, Column 4, Line 7-There is a typographical error. Please change "the" to "that".	The error was corrected.
7.	Pages 5 and 6, Section 5.11, Asbestos-Containing Material (ACM), Paragraph 1-The Building Inspection Checklist for Facility 5905 shows "N/A" for "friable asbestos containing material (ACM) noted" and "ACM noted". Please clarify potential confusion on these notes.	Misprint on VSI – "N/A" should be "No."

Item	DTSC Comments	AFRPA Response
8.	Page 6, Section 5.13, LBP (Facilities other than Housing), Sentence 1-The sentence, as written, does not correlate with Attachment 2, please correct.	The pump reservoir south will be included in the first sentence to correlate with Attachment 2 since this structure was built in 1984.
9.	Page 6, Section 5.13, LBP (Facilities other than Housing), Sentence 2-Please also include "flaking".	"Flaking" was added in sentence 2.
10.	Pages 7 and 8, Section 5.32, Adjacent Property-Please see Specific comment #1 above.	Executive Summary will be revised to reflect all sites have been reviewed and verified not to impact the Property.
11.	Attachment 1 (page 2 of 2)- a. Please include the underground and aboveground storage tanks on the figure. b. "Head Works" and "Drying Beds" are shown in the figure as buildings and "Head Works" is included in Attachment 3, but neither is included in the table (Attachment 2). Please explain and make any corrections. c. "Reservoir-earthen pond" is shown on the table (Attachment 2) and is included in Attachment 3, but it is not shown on the figure. Please explain and make any corrections. d. In the legend, is "Buildings" an accurate description of all the items in yellow for instance, are the drying beds building? If "buildings" is not an accurate description, please correct.	a. Underground and aboveground storage tanks are located with the identified facilities. b. Inclusion on facilities map does not imply they are buildings, and these features will not be added to the table. c. Reservoir-earthen pond is actually part of the waste treatment facility and is difficult to include on the map. d. An accurate description for the drying beds would be "Structures." The map label has been changed to "Buildings or Structures."
12.	Attachment 2, Parcel A-9 Structures- a. The square footage listed for facilities 5902 and 5913 is not consistent with the draft FOST for Parcel A-9. Please make the necessary corrections. b. The year constructed listed for facilities 5908S, 5908N, 5910, 5915 and the Reservoir-earthen pond is not consistent with the VSI Reports in Attachment 3. Please explain and make the necessary corrections.	a. The square footage in the FOST for facility 5913 has been revised to read "unknown." The square footage in the SEBS for facility 5902 has been revised to read "100." b. The VSIs for facilities 5908S, 5908N, and 5910 will be revised with the correct year of construction as listed in Attachment 2. The year listed for Facility 5915 will be corrected to read "1995."
13.	Attachment 3, VSI Reports-there is a VSI Report for Installation Restoration Program (IRP) Site 6, but no report (s) for IRP Site 24. Is this a mistake? If so, please correct.	The VSI for IRP Site 6 has been removed; it did not belong with this SEBS.
14.	Attachment 4, Hazardous Substances Stored/Released-Please include the dates of operation for Facility 5903.	Attachment 4 was an insert from the 1999 Updated EBS, which did not list the dates of storage. According to historical documents, storage of hazardous substances was in 1994, as listed in the FOST.
FOST		
General Comments		
1.	Please ensure consistency between the FOST and the Supplemental Environmental Baseline Survey (SEBS).	Consistency has been checked between the FOST and SEBS.
2.	Please include, in an attachment, the October 1994 No Further Action (NFA) concurrence letter from the County of Riverside Department of Environmental Health for underground storage tank (UST) Site 5901.	The NFA information for the UST Site 5901 is located in the Updated 1999 EBS. The updated 1999 EBS is a reference document for the FOST, and these specific letters have not been added.

Item	DTSC Comments	AFRPA Response
3.	Adjacent properties are discussed in the SEBS, but should also be summarized and included in the FOST.	The FOST is a tool to develop the proper Deed language. As long as the adjacent property is not affecting the Property to be transferred, there is no reason to include this information in the FOST. The Parcel A-9 SEBS confirms that adjacent property information is not necessary for the Deed. The SEBS is referenced in the FOST, and they are delivered together to the property recipient for review.
4.	Please provide as an attachment, the Air Force's policy and/or guidance regarding lead-based paint (LBP), radon and asbestos.	Policy and guidance documents will not be attached to the FOST. They are made available upon request.
5.	Are there any monitoring wells on the FOST property?	Yes, two monitoring wells are on the property. Their survey location has been added to the FOST along with the covenant to protect and maintain access (section 5.2.2).
6.	Please include in the FOST, a copy of the figure found in the SEBS (Attachment 1 (2 of 2)).	A second figure was added to the FOST. This figure will include the IRP institutional control boundaries (i.e., IC boundaries at Site 19 and the two monitoring wells).
7.	Please include a petroleum product notification and table (similar to the hazardous substances notification and table). This would list petroleum product only, which are within the scope of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Petroleum Exclusion set forth in CERCLA Section 101 (14).	No petroleum notification and table is required. There was no release or cleanup action for petroleum on Parcel A-9.
Specific Comments		
1.	Page 1, Section 1.2 (4)-Please see Enclosure A, Specific Comment #3 above.	The correct date is July 1997 and the correct title of the document is Final RI/Draft Final FS.
2.	Page 1, Section 1.2 (6)-Please see Enclosure A, Specific Comment #4 above.	The VSI dated in the FOST is correct. The January 27, 2005 VSI was accidentally included in this SEBS submittal, and has been removed.
3.	Page 1, Section 1.2 (7)-Please update with current information. The draft SEBS accompanying this draft FOST is dated May 5, 2005.	The date of the final SEBS will be used.
4.	Page 1 and 2, Table 2.0, Property Inventory Description-Please see Enclosure A, Specific Comment #12 (a).	The square footage in the FOST for facility 5913 has been revised to read "unknown." The square footage in the SEBS for facility 5902 has been revised to read "100."
5.	Page 4, Section 5.2.2, IRP Institutional Controls, Paragraph 3-Please use the language from the Operable Unit 2 Record of Decision (pages 7-7 and 10-3), which not only states that the United State will have access to the property, but that USEPA, the State of California, etc. will also have access.	The FOST language was made consistent with the Record of Decision including reservation of access by USEPA and the State of California.
6.	Page 5, Section 5.7, Underground and Aboveground Storage Tanks (USTs and ASTs)-Sentences 4 and 5 are not consistent with the SEBS (Section 5.5, Table 5-3 and Attachment 3). Please correct the inconsistencies.	The SEBS is a working document to support the FOST. The FOST is written in a format to support the Deed, therefore the information may read different than what is written in the SEBS. No change to the FOST was made.
7.	Page 7, Section 5.10, Indoor Air Quality (Radon)-Please explain why the Air Force has not tested for radon gas in facilities on the property.	As part of the Air Force program, Radon was tested for in housing areas. Parcel A-9 is does not have residential use, and the future use of this land prohibits residential reuse. We do disclose that no testing has been done.

Item	DTSC Comments	AFRPA Response
8.	<p>Pages 7 and 8, Section 5.12, Residuals of Lead-Base Paint and Lead-based Material and Debris (collectively, "LBP"), Paragraph 1, Sentence 3-Please explain in more detail the evaluation that was conducted which led to the Air Force concluding that "...remedial action under CERCLA is not necessary."</p>	<p>The Air Force's Installation Restoration Program (IRP) in totality is the evaluation and analysis conducted to reach our conclusion. The IRP conducted a comprehensive record search, aerial photo interpretation, interviews, and site assessments to determine areas of concern for potential CERCLA releases.</p> <p>The LBP paragraphs are standardized AFRPA language and will not be changed.</p>
9.	<p>Pages 7 and 8, Section 5.12, residuals of Lead-Based Paint and Lead-Based Material and Debris (collectively, "LBP")-Base on information provided in the SEBS and FOST, Parcel A-9 included facilities that were constructed prior to 1978, the year when LBP products were discontinued. The age of these facilities suggest the likelihood that LBP may be present on these facilities. This in turn creates the possibility that, through the action of normal weathering and maintenance, there may be lead from LBP in the soil surrounding these facilities. The Department of Toxic Substances Control (DTSC) maintains that lead released to the soil from LBP is a potential CERCLA release. The only LBP evaluations notified in the SEBS were visual site inspections conducted on February 18, 2005, which indicated that the interior and exterior painted surfaces of some of the facilities were chipped, cracked, peeling or flaking. Soil sampling in the vicinity of pre-1978 facilities are necessary to ensure that lead from LBP is not present at levels posing a threat to human health and the environment. Absent the evaluation of soil-lead hazards, the Air Force must lace appropriate restrictions and notification in the FOST and all associated sale and transfer documents to ensure public health and environmental protection. Please find below, the notification and restriction language DTSC is requesting:</p> <p>Although Parcel A-9 is not slated for residential reuse, please include the following notification: "Notifications of potential LBP at facilities within the parcel proposed for transfer are based on the age of construction (i.e., constructed before the Consumer Product Safety Commission's 1978 ban on LBP for residential use). The parcel proposed for transfer contains facilities that were built prior to 1978 and may contain LBP. The age of many of the facilities on the property suitable for transfer suggests the likelihood that lead-based paint may be present on some of these facilities. This in turn creates the possibility that, through the action of normal weathering and maintenance there may be leads from lead-based paint in the soil surrounding these facilities. Attachment 2 (SEBS, 2005) provides a list of all facilities within the parcels proposed for transfer and their corresponding dates of construction."</p>	<p>The Air Force does not believe that there has been a CERCLA release of lead-base paint. The text of the FOST has not been changed as a result of this comment. The Air Force will carry this comment forward as an unresolved comment.</p> <p>The FOST, and in turn the deed, already contains the notifications that DTSC is requesting. That is, notifications of the facilities on the property that were constructed prior to 1978 are identified, that LBP may be on the property, and that the grantee and successors acknowledge and accept responsibility for managing LBP in accordance with all applicable laws and regulations.</p>

Item	DTSC Comments	AFRPA Response
	<p>“Demolition of non-residential facilities built prior to 1978 creates the possibility of lead being found in the soil as a result of such activities. With respect to any such non-residential facilities which the transferee intends to demolish and redevelop for residential use after transfer, the transferee may, under applicable law or regulation, be required by DTSC or other regulatory agencies to evaluate the soil adjacent to such non-residential facilities for soil-lead hazards, and to abate any such hazards that may be present, after demolition of such no-residential facilities and prior. to occupancy of any newly constructed residential facilities.”</p> <p>Although Parcel A-9 is not slated for residential reuse, please include the following restriction: “Facilities constructed prior to 1978 may not be used for residential use or child-occupied facilities unless the transferee performs any necessary evaluation(s) and abatement in accordance with all federal, state, and local laws and other applicable requirements.”</p>	
10.	Page 9, Section 6.0., Regulator Coordination-Please reference Attachment 5.	Attachment 7 (was labeled Attachment 5 in the draft document) is referenced in the Final FOST.
11.	<p>Attachment 2, Environmental Factors Table-</p> <p>a. Indoor Air Quality (Radon) is listed in the table as not requiring deed restriction or notification, which is consistent with the FOST, Section 5.10. However, the SEBS lists Radon (Section 5.16) separately from Indoor Air quality (Section 5.15). Should there be an Indoor Air quality notification in the Attachment 2 table for the generator located in facility 5903?</p> <p>b. Energy (Utilities) is listed in the Attachment 2 table as requiring deed notification, which is inconsistent with the FOST, Section 5.15 and the SEBS, Section 5.20. Please correct the inconsistency.</p> <p>c. Outdoor Air Quality is listed in the Attachment 2 table as not requiring deed restriction or notification. This is not consistent with FOST, Section 5.14 and SEBS, Section 5.21. Please correct the inconsistency.</p>	<p>a. Notification for indoor air quality is not required. The correct location for the generator notification is in the Air Permits section. The reference regarding the facility 5903 generator has been removed from the SEBS Indoor Air Quality section.</p> <p>b. This has been corrected.</p> <p>c. The title on attachment 2 has been corrected to match the text. The correct Environmental Factor is <i>Air Conformity/Air Permits/Outdoor Air Quality</i>.</p>
12.	Attachment 4, Notice of Hazardous Substances Released-Shouldn't the date (column 5) be 1941-1965 (see SEBS, page 4)? If so, please correct.	The date range of 1941-1965 is specific to LF-1 and household waste disposal only.

**Former March Air Force Base
Public Notice of Comment Period
May 17 to June 15, 2005
FINDING OF SUITABILITY TO
TRANSFER (FOST)**

The Air Force Real Property Agency intends to sign FOST documents for Parcels A-9 and I-3, located at former March Air Force Base. Both parcels will be transferred to the March Joint Powers Authority. It is anticipated that Parcel A-9, a 32-acre parcel, will continue to be used as a wastewater treatment plant operated by the Western Municipal Water District. Parcel I-3 consists of 100 acres of undeveloped land. The FOST documents are based on an extensive review of the environmental condition of the property in consultation with federal and state environmental regulatory agencies. The property is being conveyed in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 120(h)(3). Hazardous substances were stored or known to have been released or disposed of on the parcels, and all required cleanup actions have been completed. The property became available as a result of Public Law 101-510, (the Base Realignment and Closure Act of 1990) and the subsequent realignment of March.

The public is invited to review and submit comments on this proposed transaction during the comment period, May 17 – June 15, 2005. The FOST and supporting documents can be viewed at the address below or on the web at www.afarpa.hq.af.mil/mcclellan.

**Moreno Valley Public Library
25480 Alessandro Blvd.
Moreno Valley, CA 92553**

The U.S. Air Force will consider written comments received by June 15, 2005.

Please submit comments or questions to:

Mr. Philip H. Mook, Jr. P.E.

Air Force Real Property Agency

3411 Olson Street, McClellan, CA 95652-1003

or e-mail: philip.mook@afarpa.pentagon.af.mil

Voice: (800) 655-7200, Ext 209 - Fax: (916) 643-5880